

APR - 7 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of)	MM DOCKET NO. 93-41
)	
TRIAD FAMILY NETWORK, INC.)	File No. BPED-910227MD
)	
For a Construction Permit for a)	
New Noncommercial Educational)	
Station on Channel 207C3 at)	
Winston-Salem, North Carolina)	
)	
POSITIVE ALTERNATIVE RADIO, INC.)	File No. BPED-911119MC
)	
For a Construction Permit for a)	
New Noncommercial Educational)	
Station on Channel 207A at)	
Asheboro, North Carolina)	

To: Administrative Law Judge
 Joseph P. Gonzalez

MASS MEDIA BUREAU'S FURTHER COMMENTS

1. On March 17, 1992, Positive Alternative Radio, Inc. ("Radio") petitioned for leave to amend its application to specify a new transmitter site. Triad Family Network, Inc. ("Triad") opposed Radio's amendment on March 26, 1993, arguing, among other things, that Radio's proposal is technically flawed. The Mass Media Bureau hereby submits its further comments¹ on the engineering matters raised by Triad.²

¹ The Bureau previously filed comments in support of Radio's amendment.

² In a separate filing submitted simultaneously herewith, the Bureau requests leave to file the instant comments.

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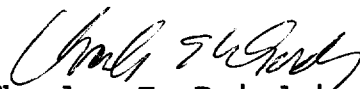
2. Triad claims that the location of Radio's proposed station in Figure 1 of Radio's amendment is inconsistent with the geographical coordinates that Radio has specified elsewhere in its amendment. Triad also asserts that the proposed site is located 198 meters above mean sea level, not 192 meters as Radio has proposed.


3. The Bureau agrees that there is indeed a discrepancy between the location of the transmitter site depicted in Figure 1 and the coordinates specified elsewhere in Radio's amendment. There also is, in the Bureau's opinion, an apparent discrepancy in the height of the proposed site above mean sea level. However, because Radio proposes to mount its antenna on an existing tower, these discrepancies may be corrected by a supplement to Radio's amendment.

4. Triad also alleges that Radio's proposed antenna system violates § 73.316 of the Commission's Rules. Based on a thorough analysis by the Bureau's technical staff, the deficiencies noted by Triad do not present a bar to grant of Radio's amended proposal. Rather, a construction permit to Radio can be appropriately conditioned at the time of its issuance in order to ensure compliance with the Commission's antenna system standards.

5. Based on the foregoing, the Presiding Judge should accept Radio's amendment. However, Radio should be required to submit a supplemental pleading which remedies the referenced discrepancies.

Respectfully submitted,
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April 7, 1993

CERTIFICATE OF SERVICE

I, Michelle C. Mebane, a secretary in the Hearing Branch, Mass Media Bureau, certify that I have, on this 7th day of April 1993, sent by regular United States mail, U.S. Government frank, copies of the foregoing, "Mass Media Bureau's Further Comments," to:

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